

UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA

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CAYUGA MEDICAL CENTER AT  
ITHACA, INC.,

Petitioner,

v.

Case No.: 18-1001

NATIONAL LABOR RELATIONS  
BOARD,

Respondent.

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**PETITIONER'S UNOPPOSED MOTION TO  
EXTEND TIME TO FILE REPLY BRIEF**

Cayuga Medical Center at Ithaca, Inc. ("Petitioner" or "CMC"), in the above-captioned matter, moves to extend the time to file its reply brief, which is currently due July 20, 2018. Petitioner requests the Court extend the time to file its brief by 14 days, or until August 3, 2018 for the reasons set forth below.

Respondent, the National Labor Relations Board, has advised that they do not oppose this motion.

1. Counsel for the Petitioner, Raymond Pascucci has full-day bargaining sessions and an arbitration scheduled for nearly every business day through July 20.
2. This is the second motion to extend the time to file a brief or pleading filed by Petitioner in this matter. Petitioner also received a 14-day

extension for its initial brief and Respondent received a 30-day extension for its opposition. Pursuant to D.C. Circuit Rule 28(e)(2), this motion is filed more than seven days before the brief is due.

**Relief Requested**

3. Petitioner requests that the Court extend the time to file its reply brief by 14 days, or until August 3, 2018 and that, if granted, any other filing deadlines be similarly extended.

Respectfully submitted this 9<sup>th</sup> day of July 2018.

Dated: July 9, 2018

BOND, SCHOENECK & KING,  
PLLC

By: /s/Raymond J. Pascucci  
Raymond J. Pascucci  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 9, 2018, a copy of the foregoing  
**PETITIONER'S UNOPPOSED MOTION TO EXTEND TIME TO FILE A  
BRIEF** was served via CM/ECF upon all counsel of record.

/s/ Raymond J. Pascucci

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Raymond J. Pascucci

**CERTIFICATE OF COMPLIANCE**

The undersigned hereby certifies, pursuant to Fed. R. App. P. 32(a)(7)(C)(i), that the foregoing motion complies with the type volume limitation set forth in Fed. R. App. 32(a)(5) and (7)(B)(i), in that the motion uses the Times New Roman 14 point font and contains no more than 7,000 words.

Specifically, in accordance with Fed. R. App. P. 32(a)(7)(C)(i), the Microsoft Word “Word Count” tool indicates that the motion contains 247 words. That word count includes “headings, footnotes, and quotations,” but excludes the “corporate disclosure statement, table of contents, table of citations, any addendum containing statutes, rules or regulations, and any certificates of counsel.” Fed. R. App. P. 32(a)(7)(B)(iii).

/s/ Raymond J. Pascucci

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Raymond J. Pascucci